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10 Attorneys for Plaintiffs

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION

14 ANGEL FRALEY; PAUL WANG; SUSAN
15 MAINZER; JAMES H. DUVAL, a minor,
by and through JAMES DUVAL, as
16 Guardian ad Litem; and W.T., a minor, by
and through RUSSELL TAIT, as Guardian
17 ad Litem; individually and on behalf of all
others similarly situated,

18 Plaintiffs,

19 v.

20 FACEBOOK, INC., a corporation; and
21 DOES 1-100,

22 Defendants.
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Case No. CV 11-01726 LHK

**DECLARATION OF
JONATHAN M. JAFFE IN
SUPPORT OF MOTION FOR
CLASS CERTIFICATION**

Courtroom: 8

Judge: Hon. Lucy H. Koh

Trial Date: December 3, 2012

1 I, Jonathan M. Jaffe, hereby state and declare:

2 1. I am an attorney licensed to practice before all the courts of the State of California as
3 well as the Northern District of California, and am one of the attorneys for Plaintiffs
4 herein. I have personal knowledge of the facts stated in this declaration, and if called
5 upon to testify, could and would competently testify thereto. I make this Declaration
6 in support of Plaintiffs' Motion for Class Certification.
7

8 2. Attached hereto as Exhibit 1 is a copy of my curriculum vitae.

9 3. I have been actively involved in the litigation of this matter since its inception.

10 4. I have been instrumental in developing the legal theories and strategies in this case.

11 5. I have worked with Information Technology departments at over 40 companies
12 during the past 17 years.
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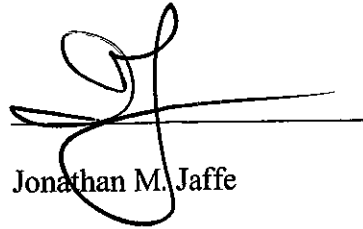
14 6. I have extensive experience in the field of integrated Internet application and system
15 design. I design and implement Internet-based data and security systems for
16 corporations globally. I have done this mainly as an independent consultant since
17 1999, and have worked in Information Technology full-time since 1993.
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19 7. The systems I design and implement range from corporate messaging systems, web
20 applications, security databases, directories, access control systems, identity
21 management systems, email systems, and others.

22 8. I have consulted on several class action cases as to computer systems as well as
23 electronic discovery, including an Internet-based legal services company and also a
24 major bank.
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1 I declare under the penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct, and that if called upon to testify, I could verify the accuracy of the
3 same. This document was executed on March 28, 2011 in San Francisco, California.
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Jonathan M. Jaffe